

**REMARKS/ARGUMENTS**

In an Office Action dated February 26, 2009 claim 46 was objected to, claims 1-19 and 39-59 were rejected under § 112; claims 1-13 and 39-53 were rejected § 102 based on Jun, U.S. Patent No. 6,421,343; and claims 14-19 and 54-59 were indicated as being allowable. Applicants cancel claims 39-59 and amend the claims as shown above and submit that the claims are allowable.

**Claims 39-59**

Claims 39-59 have been cancelled, rendering moot the objection to claim 46 and the § 112 rejections of claims 39-59.

**Section 112 Rejections**

Claims 1-19 were rejected under § 112. Applicants have made amendments to address the rejections.

**Claim 1**

Claim 1 has been amended to clarify that VWB entry was meant and to provide antecedent basis for what is now the received data record.

**Claim 12**

Claims 2 and 12 have been amended to address the rejection. Claim 2 has been amended to provide antecedent basis for the memory address space for the private buffer. Claim 12 has been amended to indicate that the VWB entry utilizes a memory address space.

**Section 102 Rejections**

Claims 1-13 were rejected § 102 based on Jun, U.S. Patent No. 6,421,343. Applicants traverse the rejections.

### **Claim 1**

Claim 1 requires reassembling said data segments of said data record using said VWB entry to form a reassembled data record; and sending said reassembled data record from the network controller directly to an I/O controller of a storage device.

The Office Action has cited Jun, col. 6, lines 45-53 and col. 7, lines 22-26 as showing the reassembling of the data record using the VWB entry. Applicants note that col. 6, lines 45-53 indicate that the received cells are reassembled in the host memory 102. Col. 7, lines 22-26 indicate the same location for the reassembly of the received cells.

The Office Action has cited Jun, col. 3, lines 48-51 and col. 6, lines 53-55 for the sending of the reassembled data record from the network controller directly to an I/O controller of a storage device. From the claim language, the reassembled data record is required to be sent from the network controller directly to the I/O controller. Jun cannot show this because, as noted above, the reassembled cell in Jun is located in the host memory, not in the local memory of the ATM host adapter. Therefore Jun cannot show sending the reassembled data record from the network controller directly to the I/O controller as Jun only has the reassembled record in the host memory, not the local memory of the network controller as would be necessary to accomplish this step.

Further, Jun does not show an I/O controller of a storage device to send the reassembled data record to. First, Jun does not show an I/O controller located in a position to allow the ATM host adapter to send it packets. Fig. 2 of Jun only shows a host processor, host memory, a system bus and the ATM host adapter. No other elements are shown inside the ATM host 100. Col. 3, lines 48-51 just indicate that reassembled packet information is transmitted to an upper network. This is not an I/O controller of a storage device as required by the claim. Col. 6, lines 53-55 do not appear to be relevant as they just describe host processor operations.

As Jun does not teach or suggest various required elements of the claim, Applicants submit the rejection is improper and must be withdrawn.

### **Claim 2**

Claim 2 requires allocating a private buffer to a memory address space in a host local memory. The Office Action cites col. 6, lines 30-33. The reassembly cell memory 310

mentioned in those lines is located in the ATM adapter local memory as indicated at col. 6, lines 19-24. Therefore the rejection has not cited memory in the required device and thus is improper.

### **Claim 3**

Claim 3 requires the network controller to be coupled to a storage target system. As discussed above with regard to claim 1, Jun does not show this coupling. The Office Action references Fig. 2, but it only shows the components mentioned above and an ATM ring network. No storage target system is shown. Withdrawal of the rejection is requested.

### **Claim 4**

Claim 4 requires that the data segments are virtually reassembled in said NC local memory to form a reassembled data record. The Office Action cites col. 7, lines 22-26. However, those lines indicate that the reassembly occurs in the host memory, not the ATM host adapter memory, as would be the required equivalency for a proper rejection. Therefore the rejection is improper and should be withdrawn.

### **Claim 5**

Claim 5 requires the I/O controller to be further coupled to a storage device. As discussed above with regard to claims 1 and 3, Jun does not show an I/O controller as required. Further, Jun does not show a storage device coupled to an I/O controller in Fig. 2. The rejection is simply improper and should be withdrawn.

### **Claim 9**

Claim 9 requires that an available private buffer is used from a pool of pre-allocated private buffers. As previously defined in claim 2, the private buffer has an address space in host memory. The Office Action cites col. 6, lines 32-42. All of the tables mentioned in those lines are contained in the ATM host adapter local memory, so the citation is improper and the rejection should be withdrawn.

**Claim 12**

Claim 12 requires that a memory address space utilized by said VWB entry is mapped to the memory address space of the allocated private buffer when the VWB entry is assigned. The Office Action cites col. 7, lines 22-26. Nothing in those lines discusses or suggests mapping items contained in the ATM host adapter to the memory space of the host memory as would be required to be equivalent to the claim. Cells are reassembled in the host memory using resources in the ATM host adapter but there is no suggestion of any mapping of memory address spaces. The rejection is improper and should be withdrawn.

**Claims 1-19**

Applicants therefore submit that claims 1-19 are allowable, either as being allowable themselves, being dependent on allowable independent claims or being dependent on allowable dependent claims.

**CONCLUSION**

Entry of the amendments is requested as they place the application in condition for allowance. Based on the above Applicants respectfully submit that all of the present claims are allowable.

Respectfully submitted,

May 26, 2009

Filed Electronically

/Keith Lutsch/  
Keith Lutsch  
Reg. No. 31,851  
Email: [WCPatent@counselip.com](mailto:WCPatent@counselip.com)  
Wong, Cabello, Lutsch,  
Rutherford & Brucculeri, L.L.P  
20333 State Highway 249, Suite 600  
Houston, TX 77070  
Voice: 832-446-2405